

Exhibit 1



Arizona Department of Child Safety

Douglas A. Ducey
Governor

Gregory McKay
Director

July 31, 2015

The Honorable Douglas A. Ducey
Governor of Arizona
1700 West Washington
Phoenix, Arizona 85005

Re: Semi-Annual Child Welfare Reporting Requirements

Dear Governor Ducey:

Pursuant to A.R.S. § 8-526, on July 27, 2015, the Arizona Department of Child Safety (DCS) submitted the semi-annual report on child welfare for the period of October 1, 2014 through March 31, 2015. This report provided information relative to reports of child abuse and neglect, investigations, shelter and receiving home services, foster homes, length of care, and adoptions.

It was originally reported that the Department's Office of Licensing and Regulation licensed 1,541 new foster homes while 785 homes left the system. As a result of a continuing review of the data in this report, the Department discovered that the number of newly licensed foster homes for this reporting period was in error. The actual number of newly licensed foster homes for this reporting period was 821 with the same number of foster homes leaving the system at 785 leaving a net gain of 36 additional foster homes.

We apologize for this error and have already begun establishing additional mechanisms to ensure the review of this data is accurate and that this error does not occur in the future. We will post the corrected version of this report to our website immediately.

If you have any questions, please contact me at (602) 255-2500.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory McKay", with a long horizontal flourish extending to the right.

Gregory McKay
Director

Enclosure

cc: President Andy Biggs, Arizona State Senate
Speaker David M. Gowan, Arizona State House of Representatives
Senator Nancy Barto, Chairman, Senate Health and Human Services Committee
Representative John M. Allen, Chairman, House Children and Family Affairs Committee
Secretary of State Michele Reagan
Kirk Adams, Chief of Staff, Office of the Governor
Joan Clark, Director, Arizona State Library, Archives, and Public Records
Bill Greeney, Director, Governor's Office of Strategic Planning and Budgeting
Laura Johnson, Policy Advisor for Human Services, Office of the Governor
Christina Corieri, Policy Advisor for Human Services, Office of the Governor
Lorenzo Romero Budget Director, Office of the Governor
John Johnson, Division Chief Council, Child and Family Protection Division, Office of the Attorney General
Emily Mercado, Analyst, Senate Health and Human Services Committee
Ingrid Garvey, Analyst, House Children and Family Affairs Committee
Melissa Taylor, Senior Policy and Operations Advisor, Senate Majority Caucus
Wendy Baldo, Chief of Staff, Senate Majority Caucus
Patsy Osmon, Policy Advisor, Senate Democratic Caucus
Pele Peacock, Policy Advisor and Staff Attorney, House Majority Caucus
Cynthia Aragon, Policy Advisor, House Democratic Caucus

CHILD WELFARE REPORTING REQUIREMENTS

SEMI-ANNUAL REPORT

FOR THE PERIOD OF

OCTOBER 1, 2014 THROUGH MARCH 31, 2015



ARIZONA REVISED STATUTES

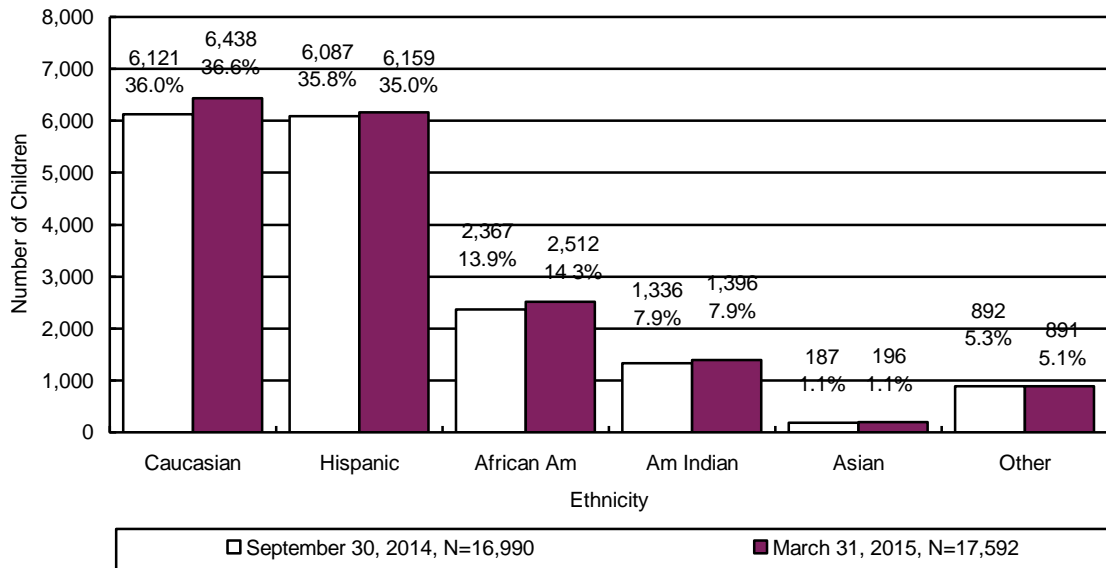
[LAWS 2011, CHAPTER 147]

ARIZONA DEPARTMENT OF CHILD SAFETY

Child Welfare Reporting Requirements

October 1, 2014 - March 31, 2015

CHART 25
THE NUMBER OF CHILDREN IN OUT-OF-HOME CARE BY ETHNICITY



For 55.5% of the children in out-of-home care, family reunification remains the primary case plan goal. See Chart 26 for additional detail on the case plan goals of children in out-of-home care.

CHART 26
THE NUMBER OF CHILDREN IN OUT-OF-HOME CARE BY CASE PLAN GOAL

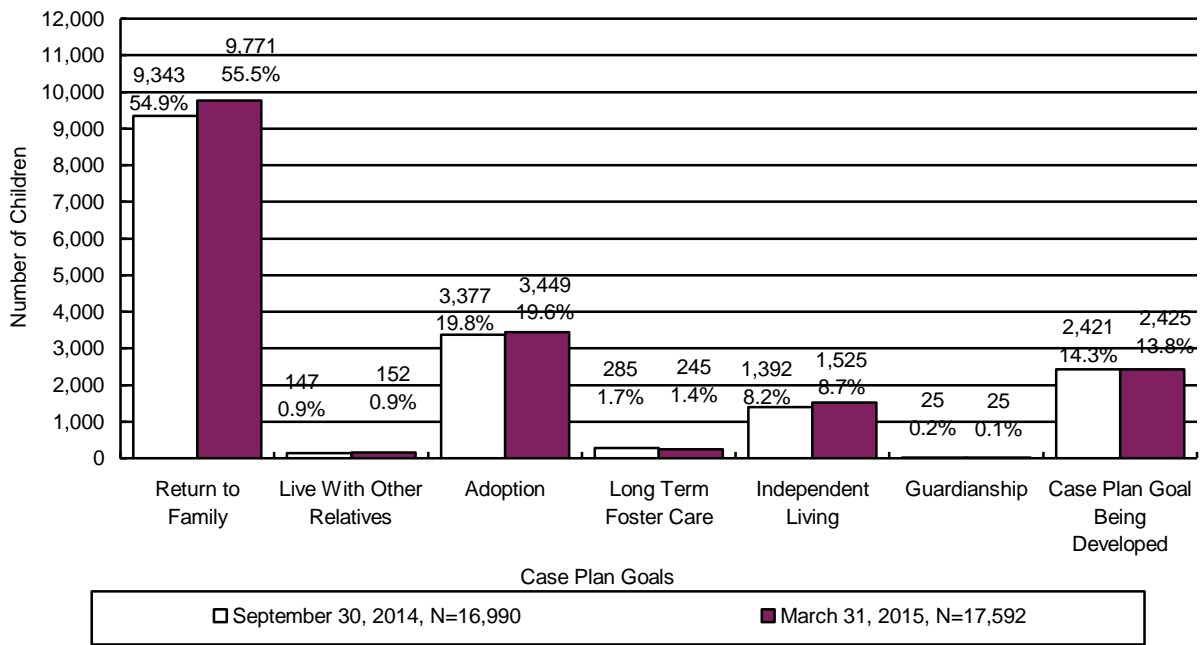


Exhibit 2

**Scharf-Norton Center for Constitutional Litigation at the
GOLDWATER INSTITUTE**

Clint Bolick (021684)
Aditya Dynar (031583)
Courtney Van Cott (031507)
500 E. Coronado Rd.
Phoenix, Arizona 85004
(602) 462-5000
litigation@goldwaterinstitute.org

COOPER & KIRK, PLLC

Michael W. Kirk (admitted *pro hac vice*)
Brian W. Barnes (admitted *pro hac vice*)
Harold S. Reeves (admitted *pro hac vice*)
1523 New Hampshire Ave., N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

A.D. and C. by CAROL COGHLAN
CARTER, their next friend;
S.H. and J.H., a married couple;
M.C. and K.C., a married couple;
for themselves and on behalf of a class of
similarly-situated individuals,
Plaintiffs,

vs.

KEVIN WASHBURN, in his official
capacity as Assistant Secretary of BUREAU
OF INDIAN AFFAIRS;
SALLY JEWELL, in her official capacity as
Secretary of Interior, U.S. DEPARTMENT
OF THE INTERIOR;
GREGORY A. McKAY, in his official
capacity as Director of ARIZONA
DEPARTMENT OF CHILD SAFETY,
Defendants.

No. CV-15-1259-PHX-NVW

**DECLARATION OF
CLINT BOLICK**

1 I, Clint Bolick, pursuant to 28 U.S.C. § 1746 declare as follows:

2 1. I am Plaintiffs' lead attorney. I have personal knowledge of the matters set
3 forth in this declaration.

4 2. Education: I graduated with a B.A., magna cum laude, with honors in
5 Political Science in May 1979 from Drew University, NJ. I earned my JD degree from
6 the University of California at Davis School of Law in May 1982.

7 3. Bar admissions: I am admitted to the bars of the United States Supreme
8 Court, State of Arizona, District of Columbia, State of California, and the U.S. Courts of
9 Appeals for the Second, Fourth, Fifth, Sixth, Seventh, Ninth, Tenth, and District of
10 Columbia Circuits.

11 4. Employment: I serve as Vice President for Litigation at the Goldwater
12 Institute's Scharf-Norton Center for Constitutional Litigation in Phoenix, Arizona. My
13 prior employment history is given in my curriculum vitae attached as an exhibit to this
14 declaration. Exhibit A.

15 5. Relevant practice experience: In over 30 years of practice, I have litigated
16 a large number of constitutional cases. A representative sample is given below:

- 17 • *Wygant v. Jackson Bd. of Educ.*, 476 U.S. 267 (1986) (successful petition for
18 certiorari).
 - 19 • *United States v. Yonkers Bd. of Educ.*, 837 F.2d 1181 (2d Cir. 1987) (school and
20 housing segregation).
 - 21 • *United States v. Overton*, 834 F.2d 1171 (school system unitary status).
 - 22 • *Davis v. Grover*, 480 N.W.2d 460 (Wis. 1992) (Milwaukee school choice
23 program).
 - 24 • *Santos v. City of Houston*, 852 F. Supp. 601 (S.D. Tex. 1994) (challenge to anti-
25 jitney law).
 - 26 • *Brown v. Barry*, 710 F. Supp. 352 (D.D.C. 1989) (challenge to ban on
27 streetcorner shoeshine stands).
- 28

- 1 • *Swedenburg v. Kelly*, 544 U.S. 460 (2005) (argued and served as lead counsel,
2 companion case to *Granholm v. Heald*) (striking down barriers to direct interstate
3 shipment of wine to consumers).
- 4 • *Bailey v. Myers*, 76 P.3d 898 (Ariz. App. 2003) (challenging eminent domain
5 abuse).
- 6 • *Zelman v. Simmons-Harris*, 536 U.S. 639 (2002) (Cleveland school choice
7 program).
- 8 • *Simmons-Harris v. Goff*, 711 N.E.2d 203 (Ohio 1999) (Cleveland school choice
9 program).
- 10 • *Kotterman v. Killian*, 972 P.2d 606 (Ariz. 1999) (Arizona scholarship tax credit).
- 11 • *Jackson v. Benson*, 578 N.W.2d 602 (Wis. 1998) (Milwaukee school choice
12 program).
- 13 • *Cornwell v. Hamilton*, 80 F. Supp. 2d 1101 (S.D. Cal. 1999) (challenge to
14 California cosmetology regulations).
- 15 • *Mullen v. Texas Dep't of Protective & Regulatory Services* (1995) (settled) (class
16 action challenge to restrictions on interracial adoptions).
- 17 • *Coleman v. City of Mesa*, 284 P.3d 863 (Ariz. 2012) (tattooing is protected
18 speech).
- 19 • *Turken v. Gordon*, 224 P.3d 158 (Ariz. 2010) (challenge to corporate subsidies
20 under the Gift Clause).
- 21 • *Niehaus v. Huppenthal*, 310 P.3d 983 (Ariz. App. 2013) (upholding
22 empowerment scholarship accounts).
- 23 • *Congress Elem. Sch. Dist. v. Warren*, 251 P.3d 395 (Ariz. App. 2011) (access to
24 public records).

25 6. In the 1990s, I litigated a case in Texas state court challenging barriers to
26 inter-racial adoptions on behalf of an adoptive couple. The case precipitated a change in
27 Texas law and was a catalyst for federal legislation that prohibits discrimination in
28 adoptions.

7. Other experience: A complete list of publications and other professional activities is contained in my curriculum vitae attached to this declaration as Exhibit A.

8. In this lawsuit, I represent the interests of my clients, not of the Goldwater Institute. At no time has the Goldwater Institute or any of its officers, non-lawyer personnel, or contributors ever attempted to dictate the litigation strategy or management of any of my cases. All litigation decisions are made by me, independent of any Institute influence or control, or by my clients.

9. I have never been the subject of any disciplinary complaint.

10. I am fully competent, along with my co-counsel, to effectively represent the interests and rights of the proposed class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of August, 2015.


Clint Bolick

RESPECTFULLY SUBMITTED this 17th day of August, 2015 by:

/s/ Aditya Dynar

Clint Bolick (021684)

Aditya Dynar (031583)

Courtney Van Cott (031507)

**Scharf-Norton Center for Constitutional Litigation
at the GOLDWATER INSTITUTE**

Michael W. Kirk (admitted *pro hac vice*)

Brian W. Barnes (admitted *pro hac vice*)

Harold S. Reeves (admitted *pro hac vice*)

COOPER & KIRK, PLLC

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Document Electronically Filed by ECF this 21st day of August, 2015. Service will be accomplished by the Court's ECF.

/s/ Kris Schlott
Kris Schlott

Exhibit A

CLINT BOLICK

15433 N. 11th St.
Phoenix, AZ 85028
Cell: (602) 717-7605
Office: (602) 462-5000
cbolick@goldwaterinstitute.org

Professional Experience

GOLDWATER INSTITUTE SCHARF-NORTON CENTER FOR CONSTITUTIONAL LITIGATION, Phoenix AZ, June 2007-present.

- *Vice President for Litigation.* Created and direct nation's first litigation center operated within a market-oriented public policy organization, focused primarily on protecting individual rights and limiting government power under state constitutions. Successful lawsuits as lead counsel include *Coleman v. City of Mesa*, 284 P.3d 863 (Ariz. 2012) (tattooing is protected speech); *Turken v. Gordon*, 224 P.3d 158 (Ariz. 2010) (challenge to corporate subsidies under the Gift Clause); *Niehaus v. Huppenthal*, 310 P.3d 983 (Ariz. App. 2013) (upholding empowerment scholarship accounts); and *Congress Elem. Sch. Dist. v. Warren*, 251 P.3d 395 (Ariz. App. 2011) (access to public records). Drafted three amendments to the Arizona Constitution that were adopted by the voters: the Health Care Freedom Act (Ariz. Const. Art. 27, § 2) and Save Our Secret Ballot (Art. 2, § 37), which were passed in 2010 by state-wide referendum and adopted in several other states; and a state sovereignty amendment (amending Art. 2, § 3), passed by referendum in 2014. Helped cultivate litigation centers in 12 states based on the Goldwater Institute model and leading an expansion of the litigation program to encompass lawsuits in other states. Supervise seven attorneys.

ALLIANCE FOR SCHOOL CHOICE and ADVOCATES FOR SCHOOL CHOICE, Phoenix AZ, April 2004-May 2007.

- *President and General Counsel.* Chief executive officer for the nation's leading nonprofit policy and advocacy groups promoting school choice for disadvantaged schoolchildren, primarily through the enactment and successful implementation of targeted private school choice programs. Over three years, the organizations helped secure passage of 20 new or expanded targeted school choice programs across the nation, providing new educational opportunities to more than 100,000 children. The combined budget and revenues increased from \$4.5 million in 2004 to \$12 million in 2007.

INSTITUTE FOR JUSTICE, September 1991-March 2006. Co-founder of the nation's premier libertarian public interest law firm.

- *Vice president and director of litigation*, Washington, D.C., 9/91-8/02. Responsible for designing and implementing an innovative constitutional litigation program aimed at

promoting individual freedom and curtailing the regulatory welfare state; and for managing a lawyer staff of between four and ten attorneys. Successful cases included *Zelman v. Simmons-Harris*, 536 U.S. 639 (2002) (Cleveland school choice program); *Simmons-Harris v. Goff*, 711 N.E. 2d 203 (Ohio 1999) (Cleveland school choice program); *Kotterman v. Killian*, 972 P.2d 606 (Ariz. 1999) (Arizona scholarship tax credit); *Jackson v. Benson*, 578 N.W. 2d 602 (Wis. 1998) (Milwaukee school choice program); *Cornwell v. Hamilton*, 80 F.Supp.2d 1101 (S.D. Cal. 1999) (challenge to California cosmetology regulations); *Mullen v. Texas Dep't of Protective and Regulatory Services* (settled) (challenge to restrictions on interracial adoptions).

- *Vice president and national director of state chapters*, Phoenix, AZ, 8/02-3/04. Responsible for launching and managing state chapters and related litigation program. Duties included assessing viability for state chapters, establishing offices, recruiting and supervising personnel, and litigating cases. Successful cases included *Bailey v. Myers*, 76 P.3d 898 (Ariz. App. 2003) (challenging eminent domain abuse).
- *Strategic litigation counsel*, Phoenix, AZ, 4/04-3/06. Consultant on litigation; argued and served as lead counsel in *Swedenburg v. Kelly*, companion to *Granholtz v. Heald*, 544 U.S. 460 (2005) (striking down barriers to direct interstate shipment of wine to consumers).

LANDMARK LEGAL FOUNDATION CENTER FOR CIVIL RIGHTS, Washington, DC, May 1988-August 1991.

- *Director*. Responsible for establishing the DC office of a Kansas City-based public interest law firm, and for designing and implementing a litigation program focusing on individual empowerment. Successful cases included *Davis v. Grover*, 480 N.W.2d 460 (Wis. 1992) (Milwaukee school choice program); *Santos v. City of Houston*, 852 F. Supp. 601 (S.D. Tex. 1994) (challenge to anti-jitney law); and *Brown v. Barry*, 710 F. Supp. 352 (D.D.C. 1989) (challenge to ban on streetcorner shoeshine stands).

UNITED STATES DEPARTMENT OF JUSTICE, CIVIL RIGHTS DIVISION, Washington, DC, March 1986-November 1987.

- *Appellate Attorney and Special Assistant to the Assistant Attorney General*. Major cases included *U.S. v. Yonkers Bd. of Education*, 837 F.2d 1181 (2d Cir. 1987) (school and housing segregation); and *U.S. v. Overton*, 834 F.2d 1171 (school system unitary status).

UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, Washington, D.C., April 1985-March 1986.

- *Special Assistant to the Commissioner*. Advised Commissioner Ricky Silberman on all aspects of EEOC policy and litigation.

MOUNTAIN STATES LEGAL FOUNDATION, Denver, CO, August 1982-April 1985.

- *Staff Attorney*. Litigated First and 14th Amendment cases. Major cases included successful petition for certiorari in *Wygant v. Jackson Bd. of Educ.*, 476 U.S. 267 (1986).

Education

UNIVERSITY OF CALIFORNIA AT DAVIS SCHOOL OF LAW, Davis, CA.

- Juris Doctorate, May 1982.

DREW UNIVERSITY, Madison, NJ.

- Bachelor of Arts, magna cum laude, with honors in Political Science, May 1979. Double major in History and Political Science.
- Received NJ teacher certification in Social Studies through reciprocal program at College of St. Elizabeth.

GEORGETOWN UNIVERSITY, Washington, DC.

- Graduated with honors in Economics from Institute for Contemporary Political and Economic Studies (Fund for American Studies), Summer 1978.

Books, Publications, and Media

Immigration Wars: Forging an American Solution (New York: Simon & Schuster/Threshold Editions, 2013), co-authored with Jeb Bush.

Two-Fer: Electing a President and a Supreme Court (Stanford, CA: Hoover Institution, 2012).

Death Grip: Loosening the Law's Stranglehold Over Economic Liberty (Stanford, CA: Hoover Institution, 2011).

David's Hammer: The Case for an Activist Judiciary (Washington, DC: Cato Institute, 2007).

Nicki's Girl (Tucson, AZ: Wheatmark, 2007) (fiction).

Leviathan: The Growth of Local Government and the Erosion of Liberty (Stanford, CA: Hoover Institution, 2004).

Voucher Wars: Waging the Legal Battle Over School Choice (Washington, DC: Cato Institute, 2003).

Transformation: The Promise and Politics of Empowerment (Oakland, CA: Center for Contemporary Studies, 1998).

The Affirmative Action Fraud: Can We Restore the American Civil Rights Vision? (Washington, DC.: Cato Institute, 1996).

Unfinished Business: A Civil Rights Strategy for America's Third Century (San Francisco: Pacific Research Institute, 1990).

Changing Course: Civil Rights at the Crossroads (New Brunswick, NJ: Transaction Books, 1988).

Columnist, *Arizona Attorney*, 2009-present.

Published articles in *New York Times*, *Washington Post*, *Wall Street Journal*, *USA Today*, *Legal Times*, *Reason*, *National Review*, *Weekly Standard*, and numerous other publications and law journals.

Profiled in Nina Easton, *Gang of Five: Leaders at the Center of the Conservative Crusade* (New York: Simon & Schuster, 2000); as well as in *New York Times*, *Washington Post*, *Los Angeles Times Magazine*, *U.S. News & World Report*, *Business Week*, and other publications.

Frequent guest on public affairs shows, including *Crossfire*, *News Hour with Jim Lehrer*, *McLaughlin One-on-One*, *Hannity & Colmes*, *Capital Gang*, and various National Public Radio shows.

Professional/Community Activities

Board of Directors, BASIS Schools, 2006-present, BASIS/DC, 2011-2012; Board of Directors, Great Hearts Preparatory Academies, 2005-present; Board of Directors, Arizona School Choice Trust, 2002-present, Chairman, 2006-2014; Research Fellow, Hoover Institution, 2002-present; Board of Directors, Arizona Charter Schools Association, 2006-14, Vice-Chairman, 2014; Citizens Committee to recommend replacement Maricopa County Attorney (appointed by Supervisor Fulton Brock), 2011; Member, U.S. Commission on Civil Rights, State Advisory Council, 2006-10, Vice-Chairman, 2009-10; Board of Directors, Pioneer Preparatory Academy, 2003-09; Senior Fellow, Goldwater Institute, 2004-07; successful pro bono attorney in *Cook v. Babbitt*, 819 F. Supp. 1 (D.D.C. 1993) (sex discrimination case against National Park Service).

Political Affiliation

Registered Independent since 2003.

Awards

Distinguished Alumni Lecture, UC Davis School of Law, 2014; Drew University, Alums Who Move the World, 2014; Legal Times, 90 Greatest Washington Lawyers of the Last 30 Years,

2008; Bradley Prize for Outstanding Achievement, 2006; Fund for American Studies, Alumni Achievement Award, 2003; *National Law Journal*, nation's top three lawyers of the year, 2002; Capital Gang, "Newsmaker of the Week," 2002; State of Wisconsin, Certificate of Commendation, 2000; Thomas J. Szasz Award for Outstanding Contributions to the Cause of Civil Liberties, 1999; Education Freedom Foundation, Achievement Award, 1999; Sovereign Fund Award, 1998; Women's Freedom Foundation, Second Annual Leadership Award, 1997; U.S. Department of Justice, Special Commendation for Outstanding Service, 1987.

Bar Affiliations

Admitted to the bars of the U.S. Supreme Court; State of Arizona; District of Columbia; State of California; and the U.S. Courts of Appeals for the Second, Fourth, Fifth, Sixth, Seventh, Ninth, Tenth, and District of Columbia Circuits.

Personal

Born in Elizabeth, NJ (1957). Married to Shawanna Matthews Bolick; father of three sons, Evan Drew, Todd Garrison, and Ryne Austin, and one daughter, Kali Aspen. Activities include wine, racquetball, hiking, writing, reading, and travel.

Exhibit 3

**Scharf-Norton Center for Constitutional Litigation at the
GOLDWATER INSTITUTE**

Clint Bolick (021684)
Aditya Dynar (031583)
Courtney Van Cott (031507)
500 E. Coronado Rd.
Phoenix, Arizona 85004
(602) 462-5000
litigation@goldwaterinstitute.org

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Michael W. Kirk (admitted *pro hac vice*)
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Harold S. Reeves (admitted *pro hac vice*)
1523 New Hampshire Ave., N.W.
Washington, D.C. 20036
(202) 220-9600
(202) 220-9601 (fax)
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

A.D. and C. by CAROL COGHLAN
CARTER, their next friend;
S.H. and J.H., a married couple;
M.C. and K.C., a married couple;
for themselves and on behalf of a class of
similarly-situated individuals,
Plaintiffs,

vs.

KEVIN WASHBURN, in his official
capacity as Assistant Secretary of BUREAU
OF INDIAN AFFAIRS;
SALLY JEWELL, in her official capacity as
Secretary of Interior, U.S. DEPARTMENT
OF THE INTERIOR;
GREGORY A. McKAY, in his official
capacity as Director of ARIZONA
DEPARTMENT OF CHILD SAFETY,
Defendants.

No. CV-15-1259-PHX-NVW

**DECLARATION OF
MICHAEL W. KIRK**

1 I, Michael W. Kirk, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am a citizen of the United States and of the Commonwealth of Virginia.
3 I am an attorney in the District of Columbia. I am a member of the bars of the State of
4 New York, the District of Columbia, the United States Supreme Court, the United States
5 Courts of Appeals for the Third, Fourth, Fifth, Sixth, Seventh, Ninth, District of
6 Columbia, and Federal Circuits, the United States District Courts for the Districts of
7 Maryland and the District of Columbia, and the United States Court of Federal Claims.
8
9

10 2. I received my J.D. degree, cum laude, in 1988 from Northwestern
11 University, after graduating with an A.B. degree, cum laude, from Georgetown
12 University in 1985. Prior to entering practice, I served as law clerk to Judge James L.
13 Ryan of the United States Court of Appeals for the Sixth Circuit.
14

15 3. I am a partner with the law firm of Cooper & Kirk, PLLC. Cooper & Kirk
16 is one of the Nation's premier trial and appellate litigation firms, with an extraordinary
17 record of success advocating for our clients in litigation with federal and state
18 governments and agencies. We litigate cases that touch on a broad array of subject
19 matters and raise a wide range of legal issues. In particular, we have extensive
20 experience and expertise litigating complex class actions raising often novel
21 constitutional, statutory, and administrative questions of law.
22
23

24 4. I have represented state and local governments in numerous complex
25 constitutional and statutory class actions involving such varied issues as Medicaid, the
26 Americans with Disabilities Act, school desegregation, and prison reform.
27
28

1 a. I currently represent the State of Tennessee in two major class actions
2 asserting due process challenges to the State's Medicaid program, and I have
3 successfully obtained the vacatur of two other long-running class action injunctions
4 against Tennessee's Medicaid program. I have represented the State of Hawaii in class
5 action Americans with Disabilities Act challenges to its Medicaid programs.
6

7 b. I have successfully represented the State of Louisiana, a Committee of the
8 Delaware legislature, and the public school districts in Marion County, Florida; Baton
9 Rouge, Louisiana; Rockford, Illinois; and Oklahoma City, Oklahoma, in long-running
10 school desegregation class action lawsuits.
11

12 5. While most of our class action experience involves representation of
13 defendants, we are currently representing a putative class of New Orleans and St.
14 Bernard Parish, Louisiana property owners (including St. Bernard Parish itself) in a
15 Takings action in the United States Court of Federal Claims seeking to recover Just
16 Compensation from the federal government for the property value they lost during
17 Hurricane Katrina as a consequence of the Government's construction and maintenance
18 of the Mississippi River Gulf Outlet canal.
19

20 6. I also have an extensive appellate practice, and have argued cases before
21 the United States Courts of Appeals for the District of Columbia, Federal, Third, Sixth,
22 Seventh, and Ninth Circuits.
23

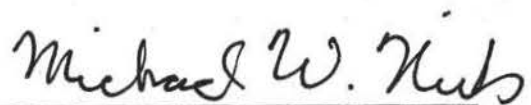
24 7. Two attorneys from our firm will be working with me on this matter: Brian
25 W. Barnes and Harold S. Reeves. Brian W. Barnes is an attorney, licensed in Colorado
26 and the District of Columbia. He clerked for Justice Samuel A. Alito of the U.S.
27
28

1 Supreme Court during the 2012 Term and previously clerked for Judge Thomas B.
2 Griffith of the U.S. Court of Appeals for the District of Columbia Circuit. Mr. Barnes
3 graduated from Yale Law School in 2010, where he was an Articles Editor for the Yale
4 Law Journal and a member of the Yale Supreme Court clinic. As an associate at Cooper
5 & Kirk, Mr. Barnes has previously litigated both constitutional and class certification
6 issues in federal court.
7

8 8. Harold S. Reeves is an attorney, licensed in the District of Columbia. He
9 graduated, summa cum laude, from Princeton University in 1991 and obtained his J.D.
10 from the University of Chicago in 1996, where he served as Articles Editor on the
11 University of Chicago Law Review. Mr. Reeves also has advanced degrees in
12 Philosophy, Theology, and Classical Philology. After clerking for Judge Douglas H.
13 Ginsburg, Mr. Reeves worked for Mayer, Brown, & Platt, LLP, and Skadden, Arps,
14 Slate, Meagher, and Flom, before joining Cooper & Kirk in 2014. Mr. Reeves, who
15 practices in the areas of constitutional, administrative, and commercial law, successfully
16 represented a parent in challenging a foreign court's assertion of emergency jurisdiction
17 in a child custody matter.
18

19 9. Cooper & Kirk has adequate resources to see this litigation through to its
20 conclusion. We are committed, moreover, to providing support at both the trial and
21 appellate stages.
22

23 Executed on August 17th, 2015.
24

25
26 
27 Michael W. Kirk
28

1 **RESPECTFULLY SUBMITTED** this 21st day of August, 2015 by:

2
3 /s/ Michael W. Kirk

4 Clint Bolick (021684)

5 Aditya Dynar (031583)

6 Courtney Van Cott (031507)

7 **Scharf-Norton Center for Constitutional Litigation**
8 **at the GOLDWATER INSTITUTE**

9 Michael W. Kirk (admitted *pro hac vice*)

10 Brian W. Barnes (admitted *pro hac vice*)

11 Harold S. Reeves (admitted *pro hac vice*)

12 **COOPER & KIRK, PLLC**

13 *Attorneys for Plaintiffs*

14 **CERTIFICATE OF SERVICE**

15 Document Electronically Filed by ECF this 21st day of August, 2015. Service
16 will be accomplished by the Court's ECF.

17 /s/ Kris Schlott

18 Kris Schlott